

Attachment C: Bureau of Water
Illinois Environmental Protection Agency 2018/2019 Performance Partnership Agreement/Performance Partnership Grant

Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.1: Water Safe to Drink				
Work Plan Outputs/Measures/Outcomes – Water Safe to Drink				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SDW-211	Percent of the population served by community water systems that receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	Mary Reed/ Jeri Long	In FY2018 and FY19, 90% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.	<p>2018 Status: 99% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.</p> <p>2019 Status: For FY19, 99.0% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.</p> <p>EPA Comments – Final Report: Measure Exceeded (RB/CB-1/21/20)</p>
SDW-SP1.N11	Percent of community water systems that meet all applicable health-based standards through approaches that include effective treatment and source water protection.	Mary Reed/ Jeri Long	In FY2018 and FY19, 90% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.	<p>2018 Status: 98% of the community water systems will meet all applicable health-based standards through approaches that include effective treatment and source water protection.</p> <p>2019 Status: For FY19, 97.9% of the population served by community water systems will receive drinking water that meets all applicable health-based drinking water standards through approaches including effective treatment and source water protection.</p> <p>EPA Comments – Final Report: Measure Exceeded (RB/CB-1/21/20)</p>
SDW-SP4a	Percent of community water systems where risk to public health is minimized through source water protection.	Rick Cobb/ Anthony Dulka	In FY2018 and FY19, minimize risk to public health through source water protection for 50% of CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).	<p>2018 Status: 50% of CWSs minimize risk to public health through source water protection for (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).</p>

				<p>2019 Status: 50% of CWSs minimize risk to public health through source water protection for (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).</p> <p><u>EPA Comments – Final Report:</u> Measure Met (RB/CB-1/21/20)</p>
SDW-SP4b	Percent of the population served by community water systems where risk to public health is minimized through source water protection.	Rick Cobb/ Anthony Dulka	By FY2018 and FY19, minimize risk to public health through source water protection for 67% of the population served by CWSs (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).	<p>2018 Status: 73% of the population served by CWSs minimize risk to public health through source water protection for (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).</p> <p>2019 Status: 73% of the population served by CWSs minimize risk to public health through source water protection for (i.e. “minimized risk” achieved by substantial implementation, as determined by the State, of actions in a source water protection strategy).</p> <p><u>EPA Comments – Final Report:</u> Measure Exceeded (RB/CB-1/21/20)</p>
SDW-01a	Percent of community water systems (CWS) that have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long Term I Surface Water Treatment and Groundwater Rules.	Steve Vance	In FY2018 and FY19, 79% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.	<p>2018 Status: 77% of CWSs will have undergone a sanitary survey within the past 3 years (5 years for outstanding performers) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.</p> <p>2019 Status: 79.1% of CWSs will have undergone a sanitary survey within the past 3 years (July 1, 2016 - June 30, 2019) as required under the Interim Enhanced and Long-Term 1 Surface Water Treatment Rules.</p> <p><u>EPA Comments – Final Report:</u> (RB/CB-1/21/20) – Data represented in the national database (SDWIS/Fed) shows 75% complete for CY2018 as reported in April, 2019. This shortfall is attributed to 5 staff vacancies within the Field Operations Section. However, IEPA’s more current data shows an increase in the percent of CWSs that have undergone a sanitary survey through June of 2019 and IEPA is actively working to increase staffing.</p>

SDW-04	Fund utilization rate [cumulative dollar amount of loan agreements divided by cumulative funds available for projects] for the Drinking Water State Revolving Fund (DWSRF).	Gary Bingenheimer	The Illinois EPA will maintain a pace of loan program activity that maximizes the availability of low interest financing for public water supply projects in Illinois.	<p>2018 Status: Completed. FFY2018: \$343,330,411 (cumulative DWSRF loan agreement dollars October 1, 2017-Sept. 30, 2018) divided by \$343,330,411 (cumulative funds available from federal grant, state match, repayments, fund equity and future leveraged bond proceeds) yields a fund utilization rate of 100%.</p> <p>2019 Status: Completed. FFY2019: \$215,067,380 (cumulative DWSRF loan agreement dollars October 1, 2018-Sept. 30, 2019) divided by \$215,067,380 (cumulative funds available from federal grant, state match, repayments, fund equity and future leveraged bond proceeds) yields a fund utilization rate of 100%.</p> <p><u>EPA Comments – Final Report:</u> <i>AJB STPSB 1/6/2020</i></p>
SDW-05	Number of Drinking Water State Revolving Fund (DWSRF) projects that have initiated operations (cumulative).	Gary Bingenheimer	Illinois EPA will continue to manage the Public Water Supply loan programs, providing low interest financing for drinking water facilities.	<p>2018 Status: Completed. FFY2018: 30 new DWSRF loan projects initiated operations.</p> <p>2019 Status: Completed. FFY2019: 47 new DWSRF loan projects initiated operations.</p> <p><u>EPA Comments – Final Report:</u> <i>AJB STPSB 1/6/2020</i></p>
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.1.3: Water Safe for Swimming				
Work Plan Outputs/Measures/Outcomes – Water Safe for Swimming				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
SS-1		Amy Dragovich	<p><u>Combined Sewer Overflow (CSO) Permits:</u> Implement the wet weather initiatives consistent with, and within the context of, the backlog strategy. CSO permits currently expired or expiring are high priority permits and Illinois EPA will provide draft major permits to Region 5 for review and will issue the permits as soon as practicable.</p> <p>Illinois EPA commits to requiring monitoring and then determining if water quality standard limits are necessary on blended flows.</p>	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity. However, USEPA is no longer requiring this metric.</p> <p><u>EPA Comments – Final Report:</u> <i>HQ/PB/1-6-20</i></p>

		Amy Dragovich	If a public hearing is necessary for EPA-reviewed permits, the proposed permit will be provided to Region 5 as soon as practicable.	<p>2018 Status: The Chicago CSO NPDES permit hearing was held June 30, 2015. Additional information from the City was received by the Permit Section on September 22, 2016 and June 26, 2017 to assist with responses for the responsiveness summary. The Agency is currently finalizing responses for the responsiveness summary. A hearing for the general permit ILM580 (Discharges from CSOs tributary to TARP operated by MWRDGC) was held August 10, 2017. The responsiveness summary is being compiled by the Agency's Office of Community Relations.</p> <p>2019 Status: No additional public hearings have been requested. Therefore, USEPA is no longer requiring this metric.</p> <p>However, USEPA is currently reviewing the July 2019 Post Construction Monitoring Report for the Thornton Reservoir. The Agency is waiting on their review before finalizing the Chicago CSO NPDES permit responsiveness summary. Additional information for the permit record was also requested from each of the dischargers having CSOs tributary to TARP. The responsiveness summary is currently being reviewed and updated by the Permit Section.</p> <p><u>EPA Comments – Final Report:</u></p>
SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will modify or review CSO permits with a schedule incorporated into an appropriate enforceable mechanism including a permit or enforcement order with specific dates and milestones, including a completion date, which requires: 1) implementation of an approved Long Term Control Plan (LTCP); or 2) implementation of any other acceptable CSO control measures consistent with the 1994 CSO Control Policy.	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity. However, USEPA is no longer requiring this metric.</p> <p><u>EPA Comments – Final Report:</u></p>
SS-1 + Clean Water Action Plan		Amy Dragovich	Illinois EPA will send an update to Region 5 on a quarterly basis. Illinois EPA will update USEPA CSO LTCP status spreadsheet, and track progress toward meeting goals under the CSO Control Plan Policy.	<p>2018 Status: Updates were forwarded to USEPA on 10/5/2017, 2/1/2018, 4/9/2018 and 12/10/2018.</p> <p>2019 Status: Updates were forwarded to USEPA on 3/29/19, 8/14/19 and 10/30/19.</p>

				EPA Comments – Final Report:
Strategic Goal 2: Protecting America's Waters				
Strategic Objective 2.2.1: Improve Water Quality on a Watershed Basis				
Work Plan Outputs/Measures/Outcomes – Improve Water Quality on a Watershed Basis				
Grant Code	Template Measures	Contacts	Performance Partnership Agreement Planned Accomplishments	Performance Partnership Grant Status/Progress
	Number of Clean Water State Revolving Fund (CWSRF) projects that have initiated operations (cumulative).	Gary Bingenheimer	Illinois EPA will continue to manage the Water Pollution Control loan programs, providing low interest financing for wastewater facilities and the "green project reserve".	<p>2018 Status: Completed. FFY2018: 32 new CWSRF loan projects initiated operations.</p> <p>2019 Status: Completed. FFY2019: 51 new CWSRF loan projects initiated operations.</p> <p>EPA Comments – Final Report: <i>AJB STPSB 1/6/2020</i></p>
SP-10	Measure W	Christine Davis	The previously selected watersheds have delisted selected pollutants of concern or have met Full Use support. Illinois EPA selected North Mill Creek (GWA) watershed to continue to meet Measure W. Targeted parameters on North Mill Creek are manganese, phosphorus and sedimentation/siltation.	<p>2018 Status: Ongoing. Section 319 project #3191712; Phase 2 started June 15, 2017. Project to be completed by September 30, 2019.</p> <p>2019 Status: Section 319 project #3191712 is complete.</p> <p>EPA Comments – Final Report: DK -Watersheds and Wetlands Branch. EPA no longer tracks this measure. Measure will be replaced with WQ 35 which is still under development 1/16/2020</p>
	Number of waterbodies identified in 2002 as not attaining water quality standards where standards are now fully attained (cumulative).	Abel Haile	USEPA will pull waters newly meeting Full Use Support biannually from the Assessment Database, or ATTAINS.	<p>2018 Status: Database is up-to-date for USEPA to pull information from.</p> <p>2019 Status: Database is up-to-date for USEPA to pull information from.</p> <p>EPA Comments – Final Report: DK -Watersheds and Wetlands Branch. EPA no longer tracks this measure. Measure will be replaced with WQ 35 which is still under development 1/16/2020</p>

WQ01a	Number of numeric water quality standards adopted or planned within 3 years for total nitrogen, total phosphorus for all waters within the State or Territory for each of the following waterbody types: rivers/streams.	Scott Twait	In 2018 and early 2019, the Illinois EPA will review the recommendations of its Science Panel. Based on this information, in late 2019 and early 2020, Illinois EPA will work with Region 5 to develop the next step in adoption of numeric nutrient criteria to protect aquatic life and recreation uses throughout Illinois.	<p>2018 Status: The Nutrient Science Advisory Committee (NSAC) is expected to publish their recommendations on December 10, 2019. Illinois EPA will review these recommendations in the remainder of 2018 and early 2019. Illinois EPA plans to provide stakeholders a review period to provide written comments on NSAC's recommendations.</p> <p>2019 Status: The NSAC report was released on January 2, 2019 and the public comment period ended April 30, 2019. Agency is reviewing the technical comments received from stakeholders during the comment period.</p> <p><u>EPA Comments – Final Report:</u> MGB WWB 1/17/2020</p>
		Trevor Sample	<u>Illinois Nutrient Loss Reduction Strategy (NLRS):</u> Illinois EPA, in collaboration with a broad range of stakeholders, developed and are implementing the NLRS that was completed in July 2015. The NLRS determines how nutrient loads (nitrogen and phosphorus) can be reduced from point sources, agriculture nonpoint sources, and urban stormwater to meet the 45% reduction goal of the 2008 Hypoxia Task Force Report. Biennial reports of progress, which also serve to update the original NLRS, will be developed and provided to USEPA (first report in 2017).	<p>2018 Status: Six working groups continue to meet. Stakeholder collaborations continue to evolve and develop to implement the recommendations in the NLRS. With funding provided by Illinois EPA, the University of Illinois Extension hired two watershed coordinators to provide education and technical assistance in priority watershed. A new Science Team has been established and has developed a process for including new practices and practice performance updates to the NLRS.</p> <p>The NLRS Science Assessment will be updated using new water quality data to estimate nutrient loads and yields both statewide and on a HUC 8 basis for both point and nonpoint sources. This information will be provided in the 2019 Biennial Report, which has a targeted release date of August 2109. The Biennial Report will also include updates on education and outreach, land use/facilities, and funding that supports NLRS implementation.</p> <p>2019 Status: The six NLRS working groups continue to meet. Stakeholder collaborations continue to evolve and develop to implement the recommendations in the NLRS. The two University of Illinois Extension watershed coordinators provided education and technical assistance in NLRS priority watersheds and focused on local stakeholder involvement for new/updated watershed-based</p>

				<p>planning. The Science Team implemented their process for including new practices and practice performance updates to the NLRS.</p> <p>The NLRS Science Assessment update is underway and will be included in the 2019 NLRS Biennial Report scheduled for release in December 2019. The Biennial Report will also include updates on education and outreach, land use/facilities, and funding that supports NLRS implementation.</p> <p><u>EPA Comments – Final Report:</u> MGB WWB 1/17/2020</p>
WQ-1d	Number of numeric water quality standards planned to be adopted within 3 years for total nitrogen and total phosphorus for all waters within the state or territory for each of the following waterbody types: lakes/reservoirs, reservoirs/streams, and estuaries, based on a full set of performance milestone information supplied annually by states and territories.	Scott Twait	<p>Continue to develop water quality standards for nutrients specific to the needs and conditions in Illinois in accordance with its approved plan. Make annual plan updates by mutual agency agreement. Illinois EPA will commit to the following timeline:</p> <ul style="list-style-type: none"> • Committee will review all available science data and methodologies relevant to numeric nutrient criteria during FY18 and early FY19. • In 2018 and early 2019, the Illinois EPA will review the recommendations of its Science Panel. Based on this information, in late 2019 and early 2020, Illinois EPA will work with Region 5 to develop the next step in adoption of numeric nutrient criteria to protect aquatic life and recreation uses throughout Illinois. 	<p>2018 Status: The Nutrient Science Advisory Committee (NSAC) is expected to publish their recommendations on December 10, 2019. Illinois EPA will review these recommendations in the remainder of 2018 and early 2019. Illinois EPA plans to provide stakeholders a review period to provide written comments on NSAC's recommendations.</p> <p>2019 Status: The NSAC report was released on January 2, 2019 and the public comment period ended April 30, 2019. Agency is reviewing the technical comments received from stakeholders during the comment period.</p> <p><u>EPA Comments – Final Report:</u> MGB WWB 1/17/2020</p>
WQ03a	Number and national percent of states & territories that within the preceding 3-year period, submitted new or revised water quality criteria acceptable to USEPA that reflect new scientific information from USEPA or other resources not	Scott Twait	The Agency will continue to work on implementation procedures for the USEPA's national criteria for ammonia. USEPA and the Agency will evaluate compliance issues that may be faced by small facilities and develop recommendations to assist such facilities to comply with the future water quality standard.	<p>2018 Status: Illinois EPA is working with Region 5, Headquarters, and other states on simplifying ammonia MDVs for small systems. Illinois EPA will continue this effort through 2019. Regarding implementing ammonia procedures, Illinois EPA is participating with the Region 5 ammonia implementation workgroup.</p> <p>2019 Status: Illinois EPA is working with Region 5, Headquarters, and other states on developing a stream-lined approach for ammonia MDVs for small systems. Illinois EPA will continue this effort through 2019. Regarding implementing ammonia procedures,</p>

	considered in the previous standards.			<p>Illinois EPA is participating with the Region 5 ammonia implementation workgroup.</p> <p><u>EPA Comments – Final Report:</u> AKJ WWB 1/21/2020</p>
	Bacteria Criteria, Recreational Uses and Disinfection Exemptions	Scott Twait	<p>Illinois EPA will work with Region 5 to evaluate the recreational uses of small, isolated rural surface waters and use that information to guide adoption of appropriate recreation uses, criteria to protect those uses and implementation strategies for facilities discharging to such waters. The Agency will then proceed with the adoption of new E. coli water quality standards to protect recreational uses once the implementation strategies for small facilities discharging into small, isolated surface waters are developed.</p>	<p>2018 Status: Illinois EPA was working with Region 5 to develop a protocol to perform a use attainability analysis (UAA) to change the recreational use of small streams downstream of small facilities. EPA Headquarters determined that this approach was not approvable. Illinois EPA will reevaluate the next step for bacteria when it has adopted the ammonia standard and variances. Illinois EPA will then dedicate its resources to the adoption of E. Coli and associated variances for small facilities.</p> <p>2019 Status: Illinois EPA will reevaluate the next step for bacteria when it has adopted the ammonia standard and variances. Illinois EPA will then dedicate its resources to the adoption of E. Coli and associated variances for small facilities.</p> <p><u>EPA Comments – Final Report:</u> AKJ WWB 1/21/2020</p>
	Lower Des Plaines River & Chicago Area Waterway UAA	Roy Smogor/ Scott Twait	<p>Illinois EPA will work with Region 5 to resolve any outstanding issues regarding the submission of the uses for CAWS (part of Subdocket C) adopted by the IPCB on February 6, 2014, and the WQS for CAWS (Subdocket D) adopted by the IPCB on June 18, 2015. Illinois EPA will then submit the rules to USEPA for approval.</p>	<p>2018 Status: Illinois EPA submitted the rules to USEPA for approval on July 13, 2018.</p> <p>2019 Status: USEPA approved the rules on June 24, 2019.</p> <p><u>EPA Comments – Final Report:</u> AKJ WWB 1/21/2020 – EPA’s understanding is that, following approval of the Subdocket C and D rules, Illinois EPA will begin considering remedies for EPA’s disapproval of recreation uses for CAWS (Subdocket A).</p>
	Status of Illinois’ monitoring strategies and other initiatives	Gregg Good	<p><u>Conduct Surface Water Monitoring and Assessment Activities funded by Section 106 of the Clean Water Act:</u></p> <ul style="list-style-type: none"> • Ambient Water Quality Monitoring Network activity at 146 ambient stream stations. • Intensive Basin Survey activity at approximately 75-125 stream stations pursuant to the basin rotation described 	<p>2018 Status:</p> <ul style="list-style-type: none"> • All 146 Ambient Water Quality Monitoring Network stations were actively monitored as planned in 2018 by the Illinois EPA (74 stations), Illinois State Water Survey (40 Stations), and U.S. Geological Survey (32 stations).

			<p>in Illinois' Water Monitoring Strategy (See Appendix C, Figure 1 at http://www.epa.state.il.us/water/water-quality/monitoring-strategy/monitoring-strategy-2015-2020.pdf).</p> <ul style="list-style-type: none"> • Facility-Related Stream Survey activity at up to five facilities. • Ambient Lake Monitoring Program activity at approximately 25-40 lakes. • Volunteer Lake Monitoring Program Tier I activity at approximately 130-160 lakes, Tier II activity at approximately 30-50 lakes, and Tier III activity as time and resources allow. • Lake Michigan Monitoring Program activity at approximately 25 nearshore survey sites, 2-3 Lake Michigan harbors, and 3-4 public water supply intakes. • Special Monitoring Survey activity for NPS/watershed, permitting, or other program on an as-needed basis. • Fish Contaminant Monitoring Program sample analysis activity. • AWQMS/STORET database management activity and regular updates. • 2018 Integrated Report submitted by 4/1/2018; draft 2020 Integrated Report by 7/30/2019. 	<ul style="list-style-type: none"> • Intensive Basin Survey monitoring was conducted at 121 stream stations in summer 2018. • Two (2) Facility-Related Stream Surveys were conducted in summer 2018. • Ambient Lake Monitoring Program activity was conducted on 29 lakes in summer 2018. • Volunteer Lake Monitoring Program activity was conducted on a total of 130 lakes; 57 lakes at the Tier I level, 69 lakes at the Tier II level, and 4 lakes at the Tier III level in summer 2018. • Lake Michigan Monitoring Program activity was conducted at 25 nearshore survey sites, 3 Lake Michigan harbors, and 4 public water supply intake sites in summer 2018. • Volunteer Lake Monitoring Program Tier III special survey monitoring was conducted at 4 lakes in summer 2018. Additionally, chlorophyll special survey monitoring was conducted at 6 lakes in Lake County. • The number of fish samples analyzed by Illinois EPA's Division of Laboratories from October 1, 2017, to September 30, 2018, was 261. • We continue to submit data to STORET via AWQMS on a regular basis. • The 2018 Integrated Report, populated Assessment Database, and geo-reference data have not yet been forwarded to Region 5. Submittal should occur by January 31, 2019. Work is just beginning towards development of the draft 2020 Integrated Report. <p>2019 Status:</p> <ul style="list-style-type: none"> • All 146 Ambient Water Quality Monitoring Network stations were actively monitored as planned in 2019 by the Illinois EPA (74 stations) and U.S. Geological Survey (72 stations). • Intensive Basin Survey monitoring was conducted at 93 stream stations in summer 2019. The number of stations was reduced from 2018 because no Intensive Basin Survey monitoring was conducted in the central region due to numerous staff retirements.
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				<ul style="list-style-type: none"> • No Facility-Related Stream Surveys were conducted in summer 2019. • Ambient Lake Monitoring Program activity was conducted on 28 lakes in summer 2019. • Due to a lack of resources, all Volunteer Lake Monitoring Program Tier I, II, and III activity was suspended in 2018. • Lake Michigan Monitoring Program activity was conducted at 25 nearshore survey sites, 3 Lake Michigan harbors, and 4 public water supply intake sites in summer 2019. • No Volunteer Lake Monitoring Program Tier III special survey monitoring was conducted in summer 2019. Chlorophyll special survey monitoring was conducted at five lakes in Lake County. • The number of fish samples analyzed for either mercury or pesticides/PCBs by Illinois EPA's Division of Laboratories from October 1, 2018, to September 30, 2019, was 506. • We continue to submit data to STORET via AWQMS on a regular basis. • The 2018 Integrated Report, populated Assessment Database, and geo-reference data have been ready to submit to Region 5 since August 2019. As agreed to with Region 5, Illinois EPA will not submit the report until after they reach final resolution with Region 5 on the 2008, 2010, 2012, 2014, and 2016 Integrated Report submittals. Work is continuing towards development of the draft 2020 Integrated Report. <p><u>EPA Comments – Final Report:</u></p> <p>DK-Watershed and Wetlands – comment last bullet point under 2019 agree 1-16-2020 EH WWB 1/17/2020</p>
Joint Priority	CWA/SDWA Integration: Harmful Algal Bloom	Rick Cobb/ Anthony Dulka/ Teri Holland	Over the period covered by this agreement, the Illinois EPA-Bureau of Water, with support from U.S. EPA Region 5 OGDW, will develop a strategy to begin reducing the risk of harmful algal blooms in Illinois reservoirs used as sources of drinking water. This strategy will include a risk-based	<p>2018 Status: Continue monitoring in 2018 at a subset of source water lakes near public water supply intakes with the addition of concurrent analysis of microcystin and cylindrospermopsin in raw and finished drinking water samples collected at the public water supply treatment facilities</p>

			approach that contains data collected and evaluated by both the Clean and Safe Drinking Water Act Programs.	<p>2019 Status: Continue monitoring in 2019 at a subset of source water lakes near public water supply intakes with the addition of concurrent analysis of microcystin and cylindrospermopsin in raw and finished drinking water samples collected at the public water supply treatment facilities</p> <p><u>EPA Comments – Final Report:</u></p>
	303 (d) List Development	Abel Haile	The final 2018 303(d) List will be submitted to USEPA on or by 4/1/2018. The 2020 draft 303(d) List will be provided to Region 5 by 7/30/2019.	<p>2018 Status: The final Draft 2018 303(d) List will be submitted to USEPA on or by 12/31/2018. The 2020 draft 303(d) List will be provided to Region 5 by 4/30/2020.</p> <p>Continue working on 2020 draft 303(d) list. Dates may need to be adjusted based on final release of new ATTAINS database.</p> <p>2019 Status: Illinois EPA and US EPA staff worked together on adoption of the new ATTAINS system to ensure that Illinois EPA's data that supports the development of the 303d portion of the Integrated Report is captured correctly.</p> <p>The Draft 2018 303(d) List submittal date to U.S. EPA is extended past 12/31/2019, while staff actively work on the non-approved portions on the 2008 – 2016 IRs.</p> <p>The 2020 draft 303(d) List will be provided to Region 5 once the 2018 IR sediment and nitrates discussion is completed.</p> <p><u>EPA Comments – Final Report:</u></p> <p>DK -Watersheds and Wetland Branch agree 1/16/2020</p>
WQ-27	Number and national percent, of approved TMDLs, that are established by states and approved by USEPA [state TMDLs] on a schedule consistent with national policy. Extent of	Abel Haile	<p>Illinois EPA no longer is funding TMDL development through the PPG; as such, TMDL development will be tracked for progress per the TMDL Vision document.</p> <ul style="list-style-type: none"> • TMDLs or alternatives will be completed for the priority areas identified in the Vision document. 	<p>2018 Status: The 2018 Vision TMDL RFP (8 watershed projects) is in progress and the contract(s) is/are expected to be awarded in the early months of 2019. These projects are part of the Illinois Vision - Nutrient Priority Watershed-Long Term Vision Goal (2016-2022).</p>

	<p>priority areas identified by each state that are addressed by EPA-approved TMDLs or alternative restoration approaches for impaired waters that will achieve water quality standards. These areas may also include protection approaches for unimpaired waters to maintain water quality standards.</p>		<ul style="list-style-type: none"> Illinois EPA will provide draft TMDLs to Region 5 30 days prior to public notice, or alternative timeframe as agreed upon, for review and comment. <p>Illinois EPA will develop an implementation plan that meets criteria for a watershed-based plan nine minimum element plan for all 319 funded TMDLs. This will be reported in the NPS Program annual report.</p>	<p>USEPA has determined IEPA has achieved 56.7% (FY18 & FY 19) of its Vision commitment, this is moving towards the 2022 completion date.</p> <ul style="list-style-type: none"> IEPA continues to work on the 2018 commitment. For 2018, 5 watershed TMDLs were approved and 5 have held final public notices/public meetings. Another 2 draft TMDL projects are in pre-public notice (USEPA review), and 2 are in Stage 3 of the TMDL development process. IEPA continues to provide draft TMDLs to USEPA 30 days or more prior to public notices. EPA continues to meet 9 minimum element requirements for TMDLs funded by CWA 319 funds. A checklist has been developed to help with USEPA reviews. <p>2019 Status: The 2018 Vision TMDL Contract (8 watershed projects) is in progress. Draft Stage 1 TMDL reports are expected to be completed in early Summer of 2020. A public notice/public meeting is planned to take place in late Summer of 2020 to inform and engage stakeholders\NPDES Permit holders in the TMDL development process. These projects are part of the Illinois Vision -Nutrient Priority Watershed-Long Term Vision Goal (2016-2022).</p> <p>IEPA is making significant progress of its Vision commitment, this is moving towards the 2022 completion date.</p> <ul style="list-style-type: none"> IEPA continues to work on the 2019 commitment. For 2019, two (2) watershed TMDLs were approved and three (3) have held final public notices/public meetings, and the Agency is in the process developing the responsiveness summary for these projects. Another 2 (two) draft Stage 3 TMDL projects are in pre-public notice (U.S. EPA review) and a public notice/public meeting is planned in the early months of 2020. IEPA continues to provide draft TMDLs to U.S. EPA for a 30-day review prior to public notice. <p>IEPA continues to meet 9 minimum element requirements for TMDLs funded by CWA 319 funds. A checklist has been developed to help with U.S. EPA reviews.</p>
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				<p><u>EPA Comments – Final Report:</u> DW WWB – In FFY19, IEPA had 6 watershed TMDL projects approved.</p>
	<p>In recognition that TMDLs developed by Illinois EPA are funded primarily with CWA Section 319 funds, TMDLs will be developed consistent with waters identified (either specifically, or by priority watershed) in Illinois EPA’s approved Nonpoint Source Management Program Plan (NPSMP).</p>	<p>Abel Haile</p>	<p>TMDLs will either address the nine elements for watershed based plans as described in EPA’s Final NPS Program and Grants Guidelines for States and Territories, App. C (April 2013), or be accompanied by separate implementation plans meeting the nine elements, to provide the basis for implementation project funding with CWA Section 319 funds. Although the Plan may look different from traditional 319 NPS plans they will be accompanied by a checklist with page number identifying where the report meets each element. USEPA will have a goal of 30 days to review such plans.</p>	<p>2018 Status: Ongoing. USEPA is reviewing draft plans. Three plans have been approved as meeting the nine minimum elements.</p> <p>IEPA is developing TMDLs for 8 watersheds as part of the 2016 TMDL RFP. These projects are in Stage 1 of the TMDL development process, and public meetings have been conducted in December 2018.</p> <p>IEPA is also working on the 2018 Vision TMDL RFP for 8 (eight) watersheds. The TMDL contract is expected to be awarded in the first quarter of 2019.</p> <p>2019 Status: IEPA has completed the Final Stage 1 TMDL reports for 8 watersheds as part of the 2016 TMDL contract. These projects are in Stage 2 – (Monitoring) as part of the TMDL development process, and the final monitoring data is being compiled and will be sent to the TMDL vendor in early 2020 to support the Draft Stage 3 TMDL development process.</p> <p><u>EPA Comments – Final Report:</u> JM WWB agree 1/21/20</p>
	<p>Nonpoint Source Management Program Plan. Illinois EPA last updated its NPSMP in 2013.</p>	<p>Christine Davis</p>	<p>Illinois EPA will continue to implement the approved 2013 NPSMP, annually review the Plan, updating as needed and doing a complete review and submission to Region 5 in 2018 2019.</p>	<p>2018 Status: Plan implementation continues. Complete review for 2018 update is approximately 80 percent complete. The NPSMP complete update will be submitted to Region V on or by June 1, 2019.</p> <p>2019 Status: Plan implementation continues. The NPSMP update will be submitted to Region V on or before January 31, 2020.</p> <p><u>EPA Comments – Final Report:</u> JM WWB agree 1/21/20</p>

	NPS workplan and 319 grant application	Christine Davis	<p>Illinois EPA will submit, and Region 5 will review and approve, annual NPS workplans consistent with the EPA's Final NPS Program and Grants Guidelines for States and Territories, and will take action to award 319 grants in accordance with the following schedule: [Note, this proposed schedule is slightly different than the one laid out in the 2000 agreement between the Agencies, but reflects current practice.]</p> <ul style="list-style-type: none"> • August 1: State competitive subgrant solicitation closes, evaluation begins • November 1: State NPS draft workplan due to EPA including subgrants proposed for funding • December 31: EPA comments on draft workplan to State January 31: State responds to EPA comments • February 28: State sends full application to EPA • April 30 or as funds received from Congress: Grant award 	<p>2018 Status: Ongoing and meeting deadlines.</p> <p>2019 Status: Ongoing and meeting deadlines.</p> <p><u>EPA Comments – Final Report:</u></p> <p>JM WWB agree 1/21/20</p>
	Development and implementation of watershed based plans (WBP)	Christine Davis	<p>Annual NPS Program reports required as a condition of 319 grant awards shall, in addition other required items, include lists and schedules of WBPs to be developed and updated in the upcoming FY. Annual Reports shall also identify priority watersheds to be targeted in the request for proposals for NPS implementation projects. (Note: This accomplishment will only be reported in the Annual NPS Program).</p>	<p>2018 Status: Ongoing. Meeting requirements, reported annually (September) through Annual NPS Program.</p> <p>2019 Status: Ongoing. Meeting requirements, reported annually (September) through Annual NPS Program.</p> <p><u>EPA Comments – Final Report:</u></p> <p>JM WWB agree 1/21/20</p>
WQ-14a	WQ-14a Number and National % of Significant Industrial Users (SIUs) that are discharging to POTWs with Pretreatment programs that have control mechanisms in place that implement applicable pretreatment standards and requirements	Roger Callaway	<p>Illinois EPA will enter into ICIS, all required NPDES data elements from the annual reports submitted by POTW with approved pretreatment programs. USEPA will provide all necessary technical assistance to Illinois EPA to ensure that required data elements are properly entered into ICIS.</p>	<p>2018 Status: All Pretreatment Annual Report data elements have been timely entered into ICIS.</p> <p>2019 Status: All Pretreatment Annual Report data elements have been timely entered into ICIS.</p> <p><u>EPA Comments – Final Report:</u></p>

	Pretreatment standards and requirements	Roger Callaway/ Sreedevi Yedavalli/ Newton Ellens	<p>By July 15 of 2018 and 2019, Illinois EPA will provide number and percent of SIUs discharging to POTWs with approved pretreatment programs.</p> <p>Copies of all pretreatment annual reports, with the exception of MWRDGC, will be sent to USEPA by June 15. A copy of the MWRDGC pretreatment annual report will be sent to USEPA by July 15.</p>	<p>2018 Status: For facilities requiring annual report submission before March 31, 2015, all pretreatment numbers were provided. Numbers for additional annual reports due after March 31, 2015 were provided to USEPA prior to September 30, 2015. All annual reports have been submitted to USEPA. Incorporating streamlining language and permit language in major POTW permits without pretreatment programs remains ongoing. All pretreatment reports have been entered into ICIS and have been sent to USEPA.</p> <p>2019 Status: For facilities requiring annual report submission before March 31, 2015, all pretreatment numbers were provided. Numbers for additional annual reports due after March 31, 2015. All annual reports have been submitted to USEPA. Incorporating streamlining language and permit language in major POTW permits without pretreatment programs remains ongoing. All pretreatment reports have been entered into ICIS and have been sent to USEPA.</p> <p><u>EPA Comments – Final Report:</u></p>
	Pretreatment standards and requirements	Amy Dragovich	<p>Illinois EPA will commit to incorporating streamlining language in POTW permits with approved pretreatment programs requiring them to modify their SUOs to incorporate required streamlining requirements.</p> <p>Illinois EPA will commit to incorporating permit language in major POTW permits without approved pretreatment programs to submit data on the industries from which the POTW is receiving process wastewater.</p>	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity. However, USEPA is no longer requiring this metric.</p> <p><u>EPA Comments – Final Report:</u></p>
	Percent of major dischargers in Significant Noncompliance (SNC) at any time during the fiscal year	Roger Callaway	Enforcement program performance must meet or exceed expectations by maintaining a Significant Non-Compliance (SNC) rate which is less than or equal to the National Average.	<p>2018 Status: SNC rate is less than the national average.</p> <p>2019 Status: SNC rate is less than the national average.</p> <p><u>EPA Comments – Final Report:</u></p>
		Roger Callaway	Prepare, and timely report to U.S. EPA, quarterly Non-Compliance Reports (QNCRs) for major facilities.	<p>2018 Status: All QNCR reports have been filed timely.</p> <p>2019 Status: All QNCR reports have been filed timely.</p>

				<u>EPA Comments – Final Report:</u>
		Roger Callaway	Compile and submit calendar year annual non-compliance reports for NPDES non-majors.	2018 Status: ANCR was prepared and retrieved by USEPA in a timely manner. 2019 Status: ANCR is no longer required. <u>EPA Comments – Final Report:</u>
	Joint Enforcement Actions Against SNC Facilities	Roger Callaway	USEPA and Illinois EPA will share joint responsibility in taking enforcement actions against three Industrial SNC facilities under the Industrial National Enforcement Initiative. Illinois EPA will verify the reported effluent concentration Significant Non-Compliance Category I violations (not the Discharge Monitoring Report Pollutant Loading tool). USEPA will in turn initiate a mutually agreed upon enforcement action. Illinois EPA will provide technical assistance to USEPA with respect to remedies proposed by the SNC facility. USEPA will issue and track compliance with schedule milestones and terminate the action upon completion of compliance requirements.	2018 Status: Ongoing. 2019 Status: Ongoing. <u>EPA Comments – Final Report:</u>
Small Systems Strategy		Roger Callaway	IEPA will implement a Small System Strategy-Compliance Assistance Program on a minimum of 7 minor municipalities. Facilities will be selected based upon population, financial needs and degree of effluent violations. For the term of this agreement, IEPA will conduct intensive inspections and will partner with the facility to develop a comprehensive action plan to assist the facility to achieve compliance, where possible.	2018 Status: IEPA has implemented a Small System Strategy for development and implementation of comprehensive action plans to assist facilities to achieve compliance where possible. 2019 Status: Ongoing. <u>EPA Comments – Final Report:</u>
Clean Water Action Plan	Resolve State Review Framework items	Roger Callaway/ Jim Miles	Take appropriate compliance and enforcement actions in accordance with the Illinois Environmental Protection Act for violations of NPDES, Stormwater, SSO/CSO, CAFO & other violations of environmental regulations. On an annual basis provide the number of Violation Notices and Referrals for NPDES, Stormwater, SSO/CSO and CAFO violations.	2018 Status: VNs issued (10/1/2017-9/30/2018): NPDES-108, SSO-3, CAFO-2, Other-12. Referrals: NPDES-7, Stormwater-4, SSO-0, CSO-0, CAFO-1, Other-2 2019 Status:

				<p>VNs issued (10/1/2018-9/30/2019): NPDES-185, SSO-3, CAFO-2, Other-10.</p> <p>Referrals: 13</p> <p><u>EPA Comments – Final Report:</u></p>
		Roger Callaway	Propose approach to revised LTCP for Wood River by 2018 and finalize in 2019.	<p>2018 Status: No alternative plan has been developed by Wood River in FFY 18. IEPA will continue to assess Wood River progress in developing an approvable LTCP.</p> <p>2019 Status: Negotiations remain ongoing between BP and Wood River for completion of LTCP.</p> <p><u>EPA Comments – Final Report:</u></p>
		Roger Callaway	Illinois EPA and USEPA Region 5 will coordinate compliance and enforcement activities to avoid duplication. Region 5 conducts inspections to implement national enforcement initiatives and other regional priorities. Region 5 will coordinate with Illinois EPA on regional activities (i.e., Industrial Enforcement Initiative).	<p>2018 Status: On a quarterly basis, IEPA will notify USEPA of any potential IEPA inspection/enforcement activities regarding the Industrial Enforcement Initiative to avoid duplication.</p> <p>2019 Status: On a quarterly basis, IEPA will notify USEPA of any potential IEPA inspection/enforcement activities regarding the Industrial Enforcement Initiative to avoid duplication.</p> <p><u>EPA Comments – Final Report:</u></p>
		Roger Callaway	Illinois EPA and USEPA will employ Violation Tracker as a resource on a quarterly basis to discuss significant noncompliance at facilities regulated as Clean Water Act dischargers (NPDES) and that warrant newer additional action (inspection, enforcement).	<p>2018 Status: CWA Tracker being discussed at quarterly Compliance/Enforcement conference calls.</p> <p>2019 Status: CWA Tracker being discussed at quarterly Compliance/Enforcement conference calls.</p> <p><u>EPA Comments – Final Report:</u></p>
		Roger Callaway	Single event violation (SEVs) entry will be performed along with the entry of major inspections.	<p>2018 Status: SEVs and major inspections are being entered into ICIS.</p>

				<p>2019 Status: SEVs and major inspections are being entered into ICIS.</p> <p><u>EPA Comments – Final Report:</u></p>
	E-Enterprise Goal: 2	Roger Callaway	<p>Illinois EPA will expand the use of electronic reporting as authorized in the NPDES Electronic Reporting Final Rule to include additional facilities as well as additional types of reports received from wastewater facilities.</p> <p>In addition, Illinois EPA will ensure data flow protocols are in place so that State can begin sharing their compliance monitoring (e.g., inspection), violation determination, and enforcement action data with EPA in a timely fashion.</p>	<p>2018 Status: IEPA continues to monitor and ensure compliance to <u>Phase I of the NPDES E-Reporting Rule</u>. Currently 98+% of Illinois' NPDES permits are utilizing/reporting monthly DMR Data with Illinois' Instance of NetDMR. Presently, a project is underway to obtain/update waivers for e-reporting or transition the final 48 facilities not report electronically to NetDMR.</p> <p>The Illinois EPA has elected to use USEPA's NeT electronic reporting tool to collect all data elements required for <u>Phase 2 of the NPDES Electronic Reporting Rule</u>. The Illinois EPA environmental management database (Athena) has been enhanced by making all data table edits required for proper alignment with the data element fields in USEPA ICIS-NPDES database.</p> <p>According to USEPA's high-level overview in the EPA Phase 2 Roadmap – NPDES eRule Phase 2 Implementation;</p> <ul style="list-style-type: none"> • USEPA will develop all general permit forms and program report forms for the NeT E-Reporting tool in seven staggered groups. • The schedule for requirement gathering, form development, testing & discussions w/Subject Matter Experts (SMEs), deployment, and user support for all 7 groups, spans from 06/2018 – 12/21/2020. • Phase 2 forms and systems will be built in the New Tech Stack (NTS) using the Agile software development process as much as possible. • Sector Specific Phase 2 data elements/forms will be developed concurrently. <p>As the various forms are developed in each staggered group, during the testing phase, Illinois EPA will continue to work collaboratively with USEPA and their contractor Windsor Solutions to create all</p>

				<p>necessary data flow pathways between the NeT Tool, Federal Database and the State systems.</p> <p>Illinois EPA will further enhance state systems to achieve the following goals:</p> <ul style="list-style-type: none"> • standardize compliance monitoring data collection • automate inspection report generation • automate/enhance tracking of compliance/enforcement actions • Finalize the development and deployment of a web based electronic Operator Certification Program • Further optimize/streamline our electronic reporting capabilities <p>2019 Status: IEPA continues to monitor and ensure compliance to <u>Phase I of the NPDES E-Reporting Rule</u>. Currently 99% of Illinois' NPDES permits are utilizing/reporting monthly DMR Data with Illinois' Instance of NetDMR. The Illinois EPA has elected to use USEPA's NeT electronic reporting tool to collect all data elements required for <u>Phase 2 of the NPDES Electronic Reporting Rule</u>. The NeT forms and reports have been developed for the Illinois NPDES Industrial SW Permit and USEPA, CGI contractors and Illinois IT are collaborating to create pathway from tool to state systems. Once done the tool will be stood up for Illinois and outreach/training and implementation of electronic reporting with NeT will begin. The next general permit to be worked on will be the Construction SW Permit.</p> <p><u>EPA Comments – Final Report:</u></p>
		Jim Miles	Illinois EPA will provide timely feedback on the nature of and results of response to, complaints forwarded to Illinois EPA by USEPA.	<p>2018 Status: Ongoing. Consistently providing timely feedback to Region 5 on all complaints that USEPA has forwarded.</p> <p>2019 Status: Ongoing. Consistently providing timely feedback to Region 5 on all complaints that USEPA has forwarded.</p> <p><u>EPA Comments – Final Report:</u></p>

	Permit Activities	Amy Dragovich	Illinois will submit the lists for majors and minors that were reissued, terminated or expired in the previous fiscal year by October 15 of end of FY18/19.	<p>2018 Status: Lists were forwarded 12/10/18.</p> <p>2019 Status: Lists are obtained through ICIS by IEPA and USEPA. Therefore, this metric is no longer needed.</p> <p><u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20</p>
		Amy Dragovich	Illinois will submit a proposed permit for review by Region 5, any NPDES permit previously on the R5 review list, which is being modified or otherwise revised in response to a permit appeal.	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity.</p> <p><u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20</p>
WQ-12a		Amy Dragovich	The goal for NPDES permit renewal is 90% of major permits will be current and 90% of minor permits will be current. Illinois EPA has been working with several local watershed stakeholders to develop watershed-specific nutrient limits based on Illinois' narrative water quality standard. A process to develop watershed-specific nutrient limits is cumbersome. Illinois EPA will need additional time to develop a nutrient permit limit that is supported by local watershed stakeholders. Because of issues raised on nutrient limits based on the Illinois narrative standard, the number of industrial NPDES permits going to public hearing, and ongoing work to resolve and implement solutions to thermal permitting issues, Illinois EPA commits that 85% of majors will be current and 90% of minors will be current. Illinois EPA and Region 5 commit to continuing to identify and implement approaches on: nutrient limits based on narrative standard; EPA meeting its goal of reviewing selected proposed permits within 30 days. Agreement to implementing an approach to nutrient limits, resolving CSO control issues, and timely reviews of permits should enhance Illinois EPA's ability to meet the goal for NPDES permit renewal of "90% of major permits will be current and 90% of minor permits will be current."	<p>2018 Status: At the end of FFY 18, the Agency was at 63% current major permit level and 91% current minor permit level. Comments have been received on almost all major permits that were public noticed, which have not been associated with any watershed group. The basic comment has been related to developing nutrient limits based on Illinois' narrative water quality standards. The Agency has worked with the Illinois Association of Wastewater Agencies and commenting non-government organizations to develop special conditions for permits to address nutrient concerns. Permits are currently being drafted to include these special conditions.</p> <p>2019 Status: At the end of FFY 19, the Agency was at 76% current major permit level and 89% current minor permit level. Nutrient special conditions are being added into permits. The Agency has also implemented new procedures to obtain timely NPDES renewal permit applications.</p> <p><u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20</p>

			Illinois EPA will commit to maintaining a high percentage of minor permits current.	
WQ-13a		Amy Dragovich	<u>Stormwater:</u> Illinois EPA will monitor any new Federal regulations concerning these permits (i.e., effluent guidelines for construction site activities, new MS4 requirements, multi-sector general permit requirements) and modify the permits as necessary.	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity. However, USEPA is no longer requiring this metric.</p> <p><u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20</p>
WQ-19a	Number of high priority State NPDES permits that are issued in the fiscal year	Darin LeCrone	Develop new priority permit lists for FFY2018 and 2019 in conjunction with Region 5 as soon as practicable near the end of each Federal fiscal year for the upcoming year. Issue 100% of the identified priority permits by the end of each FFY.	<p>2018 Status: USEPA is no longer requesting a new priority permit list per Region 5.</p> <p>2019 Status: USEPA is no longer requesting a new priority permit list per Region 5.</p> <p><u>EPA Comments – Final Report:</u> HQ/PB/1-6-20</p>
		Darin LeCrone	<u>Permit Backlog List:</u> Illinois EPA will submit a list of major or general permits, expired and expiring, for reissuance, by September 15 of each FY. Illinois EPA may identify specific permits suggested for review. Region 5 will annually identify permits, which Region 5 would review prior to public notice. The list of permits will include one or more of the issues of wet weather, TMDLs, critical industrial sectors, CSO linked to water quality impairment, toxicity, or expired more than 2 years.	<p>2018 Status: USEPA is no longer requesting a permit backlog list per Region 5.</p> <p>2019 Status: USEPA is no longer requesting a permit backlog list per Region 5.</p> <p><u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20</p>
		Amy Dragovich / Kevin Pierard / Scott Ireland	For all permits selected for review, Region 5 will review and provide Illinois EPA comments within 30 days of receiving a complete review package. Illinois EPA will address the comments and provide Region 5 a revised draft permit upon initiation of public notice. Upon, completion of public notice, Illinois EPA will provide Region 5 for review the proposed permit and Illinois EPA's response to comments.	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity.</p> <p><u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20</p>
		Amy Dragovich	Illinois EPA will submit a copy of all draft major permits that are a new discharge or a modification of a facility, which includes an expansion of a facility.	<p>2018 Status: Ongoing activity.</p> <p>2019 Status: Ongoing activity.</p>

				<u>EPA Comments – Final Report:</u> No comment HQ/PB/1-6-20
Joint Priority	Concentrated Animal Feeding Operation (CAFO) Program		<u>Work Plan Agreement:</u> Illinois EPA and Region 5 will continue to implement the 9/5/2014 Work Plan Agreement for Calendar Years 2018-2019.	2018 Status: Ongoing activity. 2019 Status: Ongoing activity. <u>EPA Comments – Final Report:</u> No comment JS/PB/1-7-20
		Jim Miles	<u>CAFO Inventory and Inventory Updates:</u> Illinois EPA will re-evaluate and update SOP for maintaining the CAFO inventory by November 15, 2017, for EPA Region 5 review and approval. Illinois EPA will maintain and update the CAFO inventory in accordance with an SOP approved by USEPA. Inventory will include all confirmed large and permitted CAFO sites identified by Illinois EPA. Identify medium universe and investigate and determine if medium AFOs are CAFOs. Document how Illinois EPA evaluated if the CAFO is required to have an NPDES permit. Illinois EPA will provide USEPA updates to the inventory two times annually (Feb. and Aug.) and make the inventory available to public.	2018 Status: The CAFO inventory has been provided twice annually to Region 5 and made available to the public. The CAFO inventory SOP is currently being updated as requested by Region 5. The CAFO SOP is currently under review. 2019 Status: The CAFO inventory has been provided twice annually to Region 5 and made available to the public. The CAFO inventory SOP is currently being updated as requested by Region 5. <u>EPA Comments – Final Report:</u> Issues related to the CAFO inventory and SOP remain unresolved but have been identified as a priority for 20-21. JS/PB/1-7-20
		Roger Callaway/ Jim Miles	Illinois EPA and EPA Region 5 will communicate on a regular basis, bi-monthly initially, monthly thereafter, to discuss CAFO workplan improvement and action items.	2018 Status: IEPA continues to have open communication with EPA Region 5 on the CAFO workplan. 2019 Status: IEPA continues to have open communication with EPA Region 5 on the CAFO workplan. <u>EPA Comments – Final Report:</u> Although communications were open they were not regular. Quarterly calls will be started under the 20-21 PPA. JS/PB/1-7-20
		Jim Miles	Illinois EPA will maintain the appropriate level of FTEs to support and manage the CAFO program as agreed to by USEPA and Illinois EPA in the revised final workload assessment.	2018 Status: Completed. The DWPC/FOS staffing needs that were summarized in the December 2013 Assessment are still valid. One new staff member was hired in 2017. 2019 Status: Two new staff members were hired in 2018 and an additional two in 2019.

				<p><u>EPA Comments – Final Report:</u> No comment at this time. Region 5 will re-evaluate the December 2013 Assessment and current State resources when the State and Region 5 evaluate the effectiveness of the State’s implementation of completed actions identified in the 20-21 PPA and past Work Plan Agreements. JS/PB/1-7-20</p>
		Darin LeCrone	<p><u>CAFO Permits:</u> Take actions on CAFO permit applications in accordance with the 3/8/2013 CAFO NPDES Permits SOP and any subsequent agreed to SOP. Submit CAFO Tracker and a summary report identifying number of permit actions by the 10th of April and October.</p>	<p>2018 Status: On-going activity. CAFO Inventory Report sent in March and August. Summary Report sent in October. Updated CAFO Tracker sent December 12, 2018.</p> <p>2019 Status: CAFO Tracker is being updated and will be forwarded by the end of the month.</p> <p><u>EPA Comments – Final Report:</u> CAFO Tracker has been submitted. JS/PB/1-7-20</p>
		Roger Callaway/ Jim Miles	<p>Illinois EPA will enter and maintain CAFO workplan inspections into ICIS.</p>	<p>2018 Status: IEPA will continue to enter and maintain NPDES permitted CAFO inspections into ICIS.</p> <p>2019 Status: IEPA is currently developing an SOP enter CAFO inspections into ICIS.</p> <p><u>EPA Comments – Final Report:</u> <u>Inspections at permitted CAFOs are routinely entered in ICIS, but not unpermitted CAFOs. CAFO Data reporting commitments (inspections and AFO/CAFO universe) have been identified in the 20 -21 PPA. JC/ECAD-WB/1-14-20</u></p>
		Jim Miles	<p>State CAFO Inspections: State will provide an annual inspection plan identifying 25 facilities. Plan should be submitted by October 31 of each year. State will submit quarterly updates that include a list of completed inspections along with copies of the inspection reports. All State inspections shall be conducted in accordance with the approved CAFO Field Procedures Manual.</p>	<p>2018 Status: Completed. The IEPA is committed to perform 60 CAFO inspections at unpermitted large CAFO in accordance with the State’s current CMS and procedures.</p> <p>2019 Status: The IEPA is committed to perform 60 CAFO inspections at unpermitted large CAFO in accordance with the State’s current CMS and procedures. Copies of the report are available.</p>

				EPA Comments – Final Report: IEPA reported inspecting two large/medium CAFOs, 63 Large unpermitted CAFOs, 33 Medium AFOs and 5 Small AFOs in FY19. JC/ECAD-WB/1-15-20
		Jim Miles	<u>USEPA Oversight Inspections:</u> USEPA will may conduct oversight inspections annually selecting facilities from Illinois' annual inspection plan (see above requirement for annual inspection plan). USEPA will provide copies of final oversight inspection reports to Illinois EPA.	<p>2018 Status: Completed. IEPA will provide USEPA facility reports and supporting documents for oversight inspections.</p> <p>2019 Status: Completed. IEPA will provide USEPA facility reports and supporting documents for oversight inspections.</p> <p>EPA Comments – Final Report: Illinois EPA and USEPA routinely work together to select at least one CAFO oversight inspection candidate annually. JC/ECAD-WB/1-14-20</p>
		Jim Miles	Newly hired CAFO inspectors will complete the CAFO NPDES training curriculum within six months of their start date, and prior to conducting inspections independently. Until Work Plan Agreement is completed, Illinois EPA will provide notification to USEPA when new hires are made and date that NPDES training curriculum was completed.	<p>2018 Status: One Springfield Regional Office staff (new hire) has completed the CAFO NPDES training curriculum. One Peoria Regional Office staff (new hire) is in the process of completing the CAFO NPDES training curriculum.</p> <p>2019 Status: One Des Plaines Regional Office staff (new hire) has completed the CAFO NPDES training curriculum. Two additional Des Plaines Regional Office staff (new hires) are in the process of completing the CAFO NPDES training curriculum.</p> <p>EPA Comments – Final Report: No comments at this time. PPA status reports for 2020 and 2021 will include a list of new hires, date of hires, and date training curriculum was completed, and date of first CAFO/AFO inspections. JC/ECAD-WB/1-14-20</p>
		Jim Miles	All staff working on AFO/CAFO issues will be trained on the revised ERG. Until Work Plan Agreement is completed, State will provide notification to USEPA when this training is completed for any existing or new hires.	<p>2018 Status: Completed. One (1) new hire FFY 18 has completed training. Two (2) new hires FFY 19 are currently being trained.</p> <p>2019 Status: Two (2) new hires FFY 19 are currently being trained.</p>

				<u>EPA Comments – Final Report:</u> No comment at this time. PPA Status reports for 2020 and 2021 will include a list of new hires, date of hires, and date training curriculum was completed, and date of first CAFO/AFO inspections. JC/ECAD-WB/1-14-20
		Roger Callaway	State will address noncompliance at CAFOs in accordance with Illinois EPA BOW Enforcement Response Guide.	2018 Status: Ongoing. 2019 Status: Ongoing. <u>EPA Comments – Final Report:</u> No comments at this time. For 2020/2021, Illinois EPA and USEPA will hold quarterly calls to discuss CAFO Work Plan actions items, CAFO permit activity, and CAFO/AFO compliance and enforcement activity. JC/ECAD-WB/1-14-20
		Jim Miles/ Chuck Gunnarson/ Roger Callaway	<u>CAFO Enforcement Updates:</u> State will submit bimonthly CAFO Enforcement Actions Summary Report. EPA will continue to schedule quarterly conference calls to discuss these reports and referred cases.	2018 Status: Agency will provide timely feedback on USEPA inquiries on any CAFO referrals. 2019 Status: Agency will provide timely feedback on USEPA inquiries on any CAFO referrals. <u>EPA Comments – Final Report:</u> USEPA no longer receives bimonthly reports. Specific reporting elements were agreed to for the 2020/2021 ENPPA. JC&RB/ECAD-WB/1-14-20
		Jim Miles/Roger Callaway	EPA Region 5 will conduct SRF program review in FY19 to evaluate Illinois EPA's CAFO program performance.	2018 Status: SRF scheduled for November 2018. SRF review was performed by USEPA staff November 27-29, 2018. 2019 Status: IEPA submitted review comments on the SRF findings November 1, 2019. <u>EPA Comments – Final Report:</u> IEPA SRF Round 4 final report is being developed. JC/ECAD-WB/1-14-20
	Inspections	Jim Miles	<u>Inspection Strategy:</u> An inspection plan, by category, will be sent to Region 5 by September 15 and will include	2018 Status: IEPA's FFY 18 Inspection Plan was submitted September 2018. A revision with additional information was

	E-Enterprise Goal: 2		projections for each year and consistency with EPA’s National Compliance Monitoring Strategy (CMS) including Majors, Traditional Non-majors, Sewage Sludge/Biosolids, Combined and Sanitary Sewer Systems, MS4, Industrial and Construction Stormwater, Large & Medium Permitted CAFOs and facilities in the CAFO Inventory. Region 5 will comment on the Illinois EPA plan 30 days after submittal.	<p>submitted September 13, 2017. IEPA’s FFY 19 Inspection Plan was submitted September 7, 2018. A revision with additional information was submitted October 5, 2018.</p> <p>2019 Status: IEPA’s FFY 19 Inspection Plan was submitted September 20, 2019 and is currently under review by USEPA.</p> <p>EPA Comments – Final Report: The FY18 & FY19 CMS plans were not approved because of inadequate medium AFO commitments. The IEPA FY20 CMS was approved on December 20, 2019. JC/ECAD-WB/1-14-20</p>
		Jim Miles	<p><u>Stormwater Inspections in Conjunction with SWCDs:</u></p> <p>Contractual agreements are in place with the designated SWCDs. These agreements govern the operations of this inspection and technical assistance program.</p>	<p>2018 Status: SWCDs under contract continue to perform construction site stormwater inspections. The IEPA inspection program continues to focus on the areas with the higher number of construction projects. IEPA is currently reviewing SWCD contracts which expire June 30, 2019.</p> <p>2019 Status: SWCDs under contract continue to perform construction site stormwater inspections. The IEPA inspection program continues to focus on the areas with the higher number of construction projects. Five contracts have been awarded to five SWCD that covers a total of eight counties.</p> <p><u>EPA Comments – Final Report:</u></p>

